

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FILED *at*

2020 FEB -7 A 10 33

UNITED STATES OF AMERICA

v.

TIFFANY M. YOUNGER,

Defendant.

Case No. 1:20-cr-25 (AJT)

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

Count 1: 18 U.S.C. § 1349

Conspiracy to Commit Bank Fraud

Notice of Forfeiture

**CRIMINAL INFORMATION**

THE UNITED STATES ATTORNEY CHARGES THAT:

**Count 1**

**Conspiracy to Commit Bank Fraud**

1. From at least in or around May 2016 to in or around October 2016, in the Eastern District of Virginia and elsewhere, defendant TIFFANY M. YOUNGER, knowingly and intentionally agreed and conspired with other persons known and unknown to the United States Attorney to knowingly execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution by means of materially false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344.

2. Some of the manner and means by which the members of the conspiracy sought to accomplish their scheme included the following:

a. Members of the conspiracy unlawfully obtained credit card numbers that were issued by financial institutions to other real persons. Members of the conspiracy did so, sometimes by purchasing stolen credit card numbers, without the knowledge and consent of such financial institutions, credit card companies, and actual account holders.

b. Members of the conspiracy acquired and used equipment and supplies to create, manufacture, and encode credit cards, including card-printing devices, magnetic-stripe encoders, and plastic card stock.

c. Members of the conspiracy distributed among themselves, including to defendant TIFFANY M. YOUNGER, the physical cards that they created or re-encoded, so that those cards could be used to make fraudulent purchases and returns in furtherance of the conspiracy, including fraudulent purchases and returns at retail businesses in the Eastern District of Virginia.

3. In furtherance of the conspiracy and to effect its objects, defendant TIFFANY M. YOUNGER committed the following overt act, among others, in the Eastern District of Virginia:

a. On or about July 4, 2016, YOUNGER entered an REI retail store located in Fairfax, Virginia, within the Eastern District of Virginia, and attempted to return \$900 worth of fraudulently purchased merchandise using a fraudulent payment card that she obtained from a co-conspirator.

(All in violation of Title 18, United States Code, Section 1349.)

**Notice of Forfeiture**

4. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant, TIFFANY M. YOUNGER, is hereby notified that if convicted of the offense alleged in Count 1, the defendant shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as a result of such offense. If property subject to forfeiture, as a result of any act or omission of the defendants,


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to and intends to seek forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

(Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)((2)(A), 28 United States Code, Section 2461(c) and Title 21, United States Code, Section 853(p).)

G. Zachary Terwilliger  
United States Attorney

By:

  
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Maya D. Song  
Monika Moore  
Assistant United States Attorneys